

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:23-cv-20349-KMW

FABIOLA MUNOZ,

Plaintiff,

v.

CROCODILE CANTINA, INC. D/B/A
MAMBO CAFÉ,

Defendant.

**VERIFIED CERTIFICATE OF PLAINTIFF'S COUNSEL
REGARDING PRIOR FILINGS UNDER THE AMERICANS WITH
DISABILITIES ACT FOR THE SUBJECT PROPERTY AND DEFENDANT**

COMES NOW, Plaintiff, FABIOLA MUNOZ, hereby files her response to the Court's January 31, 2023 Order Requiring the filing of a Verified Certificate of Counsel Regarding Any Prior Filings Under the Americans with Disabilities Act [D.E. 4]. Undersigned counsel states and verifies the following to the best of his knowledge:

1. That counsel, in good faith and prior to filing this action, conducted a search of case filings in the records of the Clerk of the United States District Court for the Southern District of Florida to ascertain whether the Defendant or the Defendant's properties and businesses have ever been sued prior to the filing of this suit for alleged violations for the same, similar, or any violations of the Americans with Disabilities Act.

2. The results of the search concluded that Defendant, CROCODILE CANTINA, INC. D/B/A MAMBO CAFÉ, has not been sued at this property prior to the filing of this suit for alleged A.D.A. violations in the United States District Court for the Southern District of Florida.

3. Undersigned counsel conducted said search of case filings in the records of the Clerk of the United States District Court for the Southern District of Florida in order to verify whether or not any such prior case filings existed against the Defendant. The search was conducted prior to filing the instant Action and re-verified prior to filing this document.

Pursuant to 28 U.S.C., Section 1746, I declare and verify under penalty of perjury that the foregoing is true and correct.

Dated: February 10, 2023

Respectfully Submitted,

GARCIA-MENOCAL & PEREZ, P.L.

Attorneys for Plaintiff

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By: /s/ Anthony J. Perez

ANTHONY J. PEREZ

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via the Court's electronic filing system upon all parties of record on this 10th day of February, 2023.

Respectfully Submitted,

GARCIA-MENOCAL & PEREZ, P.L.

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By: /s/ Anthony J. Perez
ANTHONY J. PEREZ